

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

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v.

*

Criminal No. PWG-20-374

BRIAN GILBERT

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CONSENT MOTION TO EXTEND TIME TO FILE MOTIONS

Brian Gilbert, through undersigned counsel, respectfully moves this Honorable Court to extend the time for filing of pretrial motions in this matter. The government consents to this request. In support of this motion, Mr. Gilbert states the following.

1. Mr. Gilbert is charged in a nine-count indictment with offenses related to the production, distribution, and possession of child pornography. Mr. Gilbert had an initial appearance before a magistrate judge of this Court on November 16, 2020. He consented to detention at that time and the Office of the Federal Public Defender was appointed to represent him.

2. At the initial appearance, the Court provided a scheduling order setting December 7, 2020, as the deadline for filing pretrial motions. The Court also scheduled a status call for December 11, 2020, at 1:00pm.

3. Counsel for both parties have met and conferred by telephone to discuss discovery in this matter. However, discovery has not yet been produced. In addition, an in-person review will need to be scheduled for certain discovery materials containing alleged images of child pornography. Once discovery is produced and made available for inspection, defense counsel will

need additional time to review that material, discuss it with Mr. Gilbert, and prepare any appropriate pretrial motions.

4. For these reasons, Mr. Gilbert respectfully requests that the Court extend the motions deadline by 60 days, to February 7, 2021. Mr. Gilbert further requests that the Court defer the status call until after the revised motions deadline. Counsel for the government consents to this proposed schedule. Mr. Gilbert will consent to tolling of the speedy trial clock during the 60-day extension period. A proposed order is attached.

Respectfully Submitted,
JAMES WYDA
Federal Public Defender

/s/

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